

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECTV, INC., a California Corporation, )  
Plaintiff )  
 )  
v. ) CIVIL ACTION NO.: 03-12411 PBS  
 )  
WILLIAM NEWHALL )  
Defendant )  
 )

ANSWER

The defendant, William Newhall, (hereinafter, "the defendant"), hereby Answers the Complaint as follows:

Introduction

1. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 1.
2. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 2.
3. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 3.
4. The defendant denies the allegations of paragraph 4.
5. The defendant denies the allegations of paragraph 5.

Parties

6. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 6.
7. The defendant admits the allegations of paragraph 7.

8. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 8. To the extent any allegations of wrongdoing by the defendant are asserted the defendant denies the same.

Jurisdiction and Venue

9. The defendant states that the allegations contained within this paragraph are conclusions of law not allegations of fact and therefore require no response. However, to the extent any allegations of wrongdoing by the defendant is asserted the defendant denies the same.
10. The defendant states that the allegations contained within this paragraph are conclusions of law not allegations of fact and therefore require no response. However, to the extent any allegations of wrongdoing by the defendant is asserted the defendant denies the same.
11. The defendant states that the allegations contained within this paragraph are conclusions of law not allegations of fact and therefore require no response. However, to the extent any allegations of wrongdoing by the defendant is asserted the defendant denies the same.
12. The defendant states that the allegations contained within this paragraph are conclusions of law not allegations of fact and therefore require no response. However, to the extent any allegations of wrongdoing by the defendant is asserted the defendant denies the same.

Factual Background

13. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 13
14. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 14.
15. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 15.
16. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 16.
17. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 17.
18. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 18.

19. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 19.
20. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 20.
21. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 21.
22. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 22.
23. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 23.

Defendants' Wrongful Conduct

24. The defendant denies the allegations of paragraph 24 (a) - (g) inclusive.
25. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 25.
26. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 26.
27. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 27.
28. The defendant is without sufficient knowledge to admit or deny the allegations of paragraph 28. However, to the extent any allegations of wrongdoing by the defendant is asserted the defendant denies the same.
29. The defendant denies the allegations of paragraph 29.
30. The defendant denies the allegations of paragraph 30 (a) - (b) inclusive.
31. The defendant denies the allegations of paragraph 31.
32. The defendant denies the allegations of paragraph 32 (a) - (b) inclusive.
33. The defendant denies the allegations of paragraph 33.

34. The defendant denies the allegations of paragraph 34.

First Claim

35. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 34 of this Answer as effectively as if they were separately set forth.
36. The defendant denies the allegations of paragraph 36.
37. The defendant denies the allegations of paragraph 37.
38. The defendant denies the allegations of paragraph 38.
39. The defendant denies the allegations of paragraph 39.

Second Claim

40. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 39 of this Answer as effectively as if they were separately set forth.
41. The defendant denies the allegations of paragraph 41.
42. The defendant denies the allegations of paragraph 42.
43. The defendant denies the allegations of paragraph 43.
44. The defendant denies the allegations of paragraph 44.

Third Claim

45. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 44 of this Answer as effectively as if they were separately set forth.
46. The defendant denies the allegations of paragraph 46.
47. The defendant denies the allegations of paragraph 47.
48. The defendant denies the allegations of paragraph 48.
49. The defendant denies the allegations of paragraph 49.

Fourth Claim

50. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 49 of this Answer as effectively as if they were separately set forth.
51. The defendant denies the allegations of paragraph 51.
52. The defendant denies the allegations of paragraph 52.
53. The defendant denies the allegations of paragraph 53.
54. The defendant denies the allegations of paragraph 54.

Fifth Claim

55. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 54 of this Answer as effectively as if they were separately set forth.
56. The defendant denies the allegations of paragraph 56.
57. The defendant denies the allegations of paragraph 57.
58. The defendant denies the allegations of paragraph 58.
59. The defendant denies the allegations of paragraph 59.

Sixth Claim

60. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 59 of this Answer as effectively as if they were separately set forth.
61. The defendant denies the allegations of paragraph 61.
62. The defendant denies the allegations of paragraph 62.
63. The defendant denies the allegations of paragraph 63.
64. The defendant denies the allegations of paragraph 64.

Seventh Claim

65. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 64 of this Answer as effectively as if they were separately set forth.

66. The defendant denies the allegations of paragraph 66.
67. The defendant denies the allegations of paragraph 67.
68. The defendant denies the allegations of paragraph 68.
69. The defendant denies the allegations of paragraph 69.
70. The defendant denies the allegations of paragraph 70.

Eighth Claim

71. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 71 of this Answer as effectively as if they were separately set forth.
72. The defendant denies the allegations of paragraph 72.
73. The defendant denies the allegations of paragraph 73.
74. The defendant denies the allegations of paragraph 74.

Ninth Claim

75. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 74 of this Answer as effectively as if they were separately set forth.
76. The defendant denies the allegations of paragraph 76.
77. The defendant denies the allegations of paragraph 77.
78. The defendant denies the allegations of paragraph 78.

Tenth Claim

79. The defendant reasserts and incorporate by reference, the answers contained within paragraphs 1 through 78 of this Answer as effectively as if they were separately set forth.
80. The defendant denies the allegations of paragraph 80.
81. The defendant denies the allegations of paragraph 81.
82. The defendant denies the allegations of paragraph 82.

**Seventh Affirmative Defense**

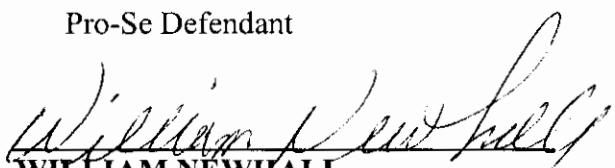
The defendant state that damage incurred by the plaintiff, if any, were caused by the acts or omissions of a person or entity for which the defendant was not and is not legally responsible.

WHEREFORE, the defendant William Newhall, prays that the Complaint, be dismissed and further that the defendant recover his costs, including attorney's fees, incurred in the defense of this Complaint.

**JURY DEMAND**

The defendant hereby demands a trial by jury on all issues so triable.

Pro-Se Defendant

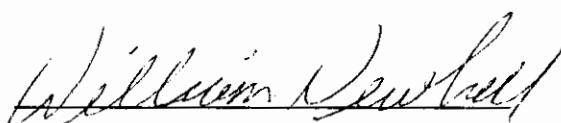
  
**WILLIAM NEWHALL**  
41 Union Court  
Lynn, MA 01902  
(781) 581-5741

Date: August 8, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by first class mail, postage per-paid, on this date.  
(Return receipt requested)

Date: August 8, 2005

  
**WILLIAM NEWHALL**